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IN THE UNITED STATES DISTRICT COURT EASTERN DISTRICT OF MISSOURI

C4 1999

L. S. DISTRICT COURT

CHERRY HAWKINS, et al.,

Plaintiffs,

v.

Cause No. 4:98-CV02044RWS

ST. LOUIS COUNTY, etc., et al.,

Defendants.

SEPARATE ANSWER OF MICHAEL ZYLKA, M.D. AND STEVEN PAYNE
TO PLAINTIFFS' FIRST AMENDED COMPLAINT

GENERAL ALLEGATIONS

COME NOW Defendants Michael Zylka, M.D. and Steven Payne, by and through their attorneys, Luther & Associates, and for their Answer to the General Allegations of Plaintiffs' First Amended Complaint, state as follows:

- 1-4. Defendants Zylka and Payne generally deny the allegations as set out in Paragraphs 1 through 4 of Plaintiffs' First Amended Complaint.
- 5-6. Defendants Zylka and Payne lack any information upon which to form a belief relative to the allegations as set out in Paragraphs 5 and 6 of Plaintiffs' First Amended Complaint and, therefore, deny same.
- 7. Defendants Zylka and Payne lack any information upon which to form a belief relative to the employment status of other defendants, but deny that they contracted with St. Louis County.
- 8-10. Defendants Zylka and Payne lack any information upon which to form a belief relative to the allegations as set out in

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AN ORDER, JUDGMENT OR ENDORSEMENT WAS SCANNED, FAXED AND/OR MAILED TO THE FOLLOWING INDIVIDUALS ON 10/14/99 by cahring 4:98cv2044 Hawkins vs St. Louis County

42:1983 Civil Rights Act

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C. D. D.